

State of New Jersey DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF WATER RESOURCES TRENTON, NEW JERSEY, 08625

August 31. 1979

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. F. Jay Singleton, President L. E. Carpenter and Company 170 North Main Street Wharton, New Jersey 07885

Re: Waste Management Plan L. E. Carpenter and Company Wharton, New Jersey

Dear Mr. Singleton:

This letter is in reference to the meeting at L. E. Carpenter and Company on July 25, 1979 and the letter of August 8, 1979 from Mr. Robert D. Mutch, Jr., of Wehran Engineering.

The Department shares Mr. Mutch's view that our meeting and tour of the L. E. Carpenter site was beneficial and clarified the viewpoints of the Company and the Department in addressing this matter. We fully concur that close involvement by the Department in the development and implementation of a waste management plan is vital.

In order to ensure that this plan is developed in a timely fashion and is ultimately acceptable to the Department the following will be required:

- 1. Receipt of the waste characterization which your letter of August 8, 1979 indicated would be available on or about August 22, 1979.
- 2. Receipt of the waste management plan by September 26, 1979 as indicated in your letter.
- 3. The waste management plan must incorporate a program for monitoring its effectiveness through the installation of monitoring wells and the sampling of such wells before and after implementation of the plan.
- 4. If the waste management plan recommends removal of the waste material, the issue of dewatering of the excavation during removal and the disposition of such waters must be fully addressed.



5. The upgrading of the adjacent storage tank area must be included in addressing the renovation and future management of the waste disposal site.

During our meeting on July 25, 1979, L. E. Carpenter expressed reservations on the need for a groundwater monitoring program and was not prepared at that time to make any committments relative to initiating such a program. The Department remains convinced that such a program is an essential element of any waste management plan and will be unable to approve of any plan which does not incorporate such a program. In order to minimize the potential for future delays over this issue, L. E. Carpenter should advise the Department within ten (10) days from receipt of this letter of its current position on the principle of a groundwater monitoring program.

Enclosed for your information are the laboratory analyses of samples collected by the Department at the L. E. Carpenter plant. As noted during our meeting the sample including discharge #002 contained significant concentrations of Xylene. In addition, problems were noted in attempting to obtain direct samples from discharges #001 and #002 free from storm and/or surface water influence.

L. E. Cappenter is therefore directed to respond in writing within ten (10) days from receipt of this letter explaining the presence of Xylene in the sample collected in the area of discharge #002 and steps being taken to provide directly accessable sampling points for discharges #001 and #002. At that time L. E. Carpenter should also confirm steps taken to date to upgrade general housekeeping at the plant site and the arrangements made for off-site disposal of wastematerials. On the matter of housekeeping it is suggested that L. E. Carpenter consider the removal or sealing of unused pipes terminating at the river bank in the area of the boiler house.

If you have any questions on this matter please do not hesitate to contact us.

Very truly yours,

Peter T. Lynch, Manager Passaic-Hackensack Basin Water Pollution Control Monitoring, Surveillance and Enforcement Element

E28:G19

cc: Mr. Mutch

Mr. Schwartz

Mr. Klepp. GWM

Ms. Heacox, ORA

Mr. Guadagnino, Borough of Wharton

Enclosures